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December 4, 2023

Hon. Lorna Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Cypress Holdings, III, LLP v. George Hall, et al.*  
Case No.: 22-cv-01243 (LGS)

Your Honor:

I am the attorney for plaintiff Cypress Holdings, III, L.P. ("Cypress"). Please accept this letter a formal application to have Exhibits A-N to the Declaration of Alexander M. Dudelson filed under seal pursuant to Your Honor's Individual Rule (I)(D), 21-mc-13 and § 6 of the SDNY Rules and Instructions. Said documents were exchanged in discovery by the defendants and marked as "Confidential - Subject to Protective Order." It is respectfully requested that access to these documents be restricted to attorneys appearing for filer the following Selected Parties:

- a. Sport-BLX, Inc.;
- b. Glassbridge Enterprises, Inc.;
- c. George Hall;
- d. Joseph Deperio;
- e. Clinton Group, Inc.;
- f. Sport-BLX Securities, Inc.;
- g. Cesar Baez;
- h. Christopher Johnson;
- i. Francis Ruchalski; and
- j. Daniel Strauss.

Thank you for your consideration.

Very truly yours,

/s/ *Alexander Dudelson*

Alexander M. Dudelson

**Via ECF:** All parties